

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

ENTROPIC COMMUNICATIONS, LLC,  
Plaintiff,  
v.  
CHARTER COMMUNICATIONS, INC.,  
Defendant.

Civil Action No. 2:23-cv-00051-JRG

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Rule CV-5(a)(7), Defendant Charter Communications, Inc. (“Defendant”) hereby respectfully moves the Court for leave to file under seal Defendant’s Reply Brief in Further Support of its Motion to Dismiss the Amended Complaint for Improper Venue pursuant to Federal Rule of Civil Procedure 12(b)(3) (the “Reply Brief”). The Reply Brief discusses confidential proprietary and business information, including information that the parties have previously agreed to file under seal in *Entropic Communications, LLC v. Charter Communications, Inc.*, No. 22-CV-0125(JRG) (E.D. Tex.), pursuant to a Protective Order. See No. 22-CV-0125(JRG) (E.D. Tex.), Dkt. 36 (Protective Order) and Dkt. 61 (Sealed Motion to Dismiss).

Counsel for Defendant has conferred with Counsel for Plaintiff Entropic Communications, LLC and this motion is unopposed.

**WHEREFORE**, Defendant respectfully requests that the Court grant its motion.

Dated: May 12, 2023

Respectfully submitted,

/s/ *Elizabeth Long*

Daniel L. Reisner

David Benyacar

Betsy Long  
Albert J. Boardman  
Melissa Brown  
ARNOLD & PORTER KAYE SCHOLER LLP  
250 West 55th Street  
New York, New York, 10019-9710  
Telephone: (212) 836-8000  
Email: [daniel.reisner@arnoldporter.com](mailto:daniel.reisner@arnoldporter.com)  
Email: [david.benyacar@arnoldporter.com](mailto:david.benyacar@arnoldporter.com)  
Email: [elizabeth.long@arnoldporter.com](mailto:elizabeth.long@arnoldporter.com)  
Email: [albert.boardman@arnoldporter.com](mailto:albert.boardman@arnoldporter.com)  
Email: [melissa.brown@arnoldporter.com](mailto:melissa.brown@arnoldporter.com)

Deron R. Dacus  
State Bar No. 00790553  
The Dacus Firm, P.C.  
821 ESE Loop 323, Suite 430  
Tyler, TX 75701  
Phone: (903) 705-1117  
Fax: (903) 581-2543  
Email: [ddacus@dacusfirm.com](mailto:ddacus@dacusfirm.com)

*Attorneys for Defendant  
Charter Communications, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 12, 2023, I caused to be served a copy of the foregoing motion on all counsel of record via the Court's CM/ECF system.

*/s/ Elizabeth Long* \_\_\_\_\_  
Elizabeth Long

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel for Defendant has complied with the meet and confer requirement in Local Rule CV-7(h). Counsel for Plaintiff Entropic Communications, LLC indicated that it does not oppose the relief sought in this motion.

*/s/ Elizabeth Long* \_\_\_\_\_  
Elizabeth Long